

DOUGLAS COHEN, ESQ. (SBN 1214)
ROYI MOAS, ESQ. (SBN 10686)
**WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP**
3556 E. Russell Road, Second Floor
Las Vegas, Nevada 89120
Tel.: (702) 341-5200/Fax: (702) 341-5300
Email: dcohen@wrslawyers.com
Email: rmoas@wrslawyers.com
*Attorneys for Defendant, PLANET
MOVING & STORAGE. INC*

CHRISTIAN GABROY (SBN 8805)
KAINE MESSER (SBN 14240)
GABROY LAW OFFICES
The District at Green Valley Ranch
170 South Green Valley Parkway, Ste., 280
Henderson, Nevada 8912
Tel.: (702) 259-7777/Fax (702) 259-7704
Email: christian@gabroy.com
Email: kmesser@gabroy.com
Attorneys for Plaintiff ROBIN WELLS

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROBIN WELLS, an individual,

Plaintiff,

vs.

PLANET MOVING & STORAGE, INC.
d/b/a and a/k/a NEW PLANET MOVING &
STORAGE; DOES I through X; and ROE
CORPORATIONS, LLCs, COMPANIES,
AND/OR PARTNERSHIPS XI through XX,
inclusive,

Defendants.

Case No. 2:18-cv-02435

**STIPULATION AND ORDER TO:
EXTEND DEFENDANT'S DEADLINE
TO ANSWER COMPLAINT**

Eighth Judicial Case Complaint Filed:
November 21, 2018

Removal to District Court Filed:
December 28, 2018

RECITALS

On November 21, 2018, Plaintiff ROBIN WELLS ("Plaintiff") filed her Complaint with Jury Demand in the Eighth Judicial District Court of Clark County, Nevada (the "Complaint"). The Complaint names PLANET MOVING & STORAGE, INC. ("Defendant") as the sole Defendant and asserts the following three causes of action: (1) Sex Discrimination/Harassment Title VII 42 U.S.C § 2000e et seq./NRS613.330; (2) Retaliation 42 U.S.C. § 2000e et seq./NRS 613.340 (3) Negligent Hiring, Training, & Supervision (the "Complaint").

Defendant was served with the Summons and Complaint on December 12, 2018. On December 27, 2018 Plaintiff's counsel provided the Defendant an extension to respond to the

1 Complaint, and on December 28, 2018 Defendant filed its Notice to Federal Court of Removal of
2 Civil Action.

3 At this time, Parties have agreed to extend the time for Defendant to reply to the
4 Complaint to March 1, 2019, while the parties work on appropriate settlement paperwork.

5 **STIPULATION**

6 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between
7 Plaintiff and Defendant, through their respective undersigned counsel of record, as follows:

8 (1) Defendant's deadline to respond to Plaintiff's Complaint shall be extended to March
9 1, 2019.

10 **IT IS SO STIPULATED.**

11 DATED: January 24, 2019

WOLF, RIFKIN, SHAPIRO, SCHULMAN
& RABKIN, LLP

12
13 By: /s/Royi Moas, Esq.

14 On behalf of Defendant

15 DATED: January 24, 2019

GABROY LAW OFFICES

16
17 By: /s/ Kaine Messer, Esq.

18 On behalf of Plaintiff

19
20 **ORDER**

21 IT IS HEREBY ORDERED, this 25 day of January, 2019:

22 1. Defendant's deadline to respond to Plaintiff's Complaint is extended to March 1,
23 2019.

24
25 
26 U.S. Magistrate Judge